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11 Attorneys for Finley River LLC,  
12 Hillcrest Mining Company, LLC, and  
13 Hi-Tech Exploration, LTD  
14

15 IN THE UNITED STATES BANKRUPTCY COURT  
16 FOR THE DISTRICT OF NEVADA  
17

18 IN RE:

Case No. 13-50301-mkn

Chapter 11

19 RODEO CREEK GOLD INC.,

Debtor.

**RESERVATION OF RIGHTS  
REGARDING MOTION FOR AN  
ORDER (A) APPROVING THE SALE,  
(B) AUTHORIZING THE SALE,  
ASSUMPTION, AND ASSIGNMENT  
OF CERTAIN EXECUTORY  
CONTRACTS AND UNEXPIRED  
LEASES, AND (C) GRANTING  
FURTHER RELIEF**

Hearing Date: May 2, 2013  
Hearing Time: 1:30 pm

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23 Hillcrest Mining Company LLC (Hillcrest), Finley River Company LLC. (Finley  
24 River), and Hi-Tech Exploration Ltd. (Hi-Tech), by and through their counsel record,  
25 hereby file their Reservation of Rights Regarding Debtors' Motion for an Order (A)  
26 Approving the Sale, (B) Authorizing the Sale, Assumption, and Assignment of Certain  
27 Executory Contracts and Unexpired Leases, and (C) Granting Further Relief.  
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Hillcrest, Finley River and Hi-Tech are owners of mining claims on which the Debtors are currently conducting mining and/or exploration activities. The mining claims owners have previously filed a Reservation of Rights (Doc. 325) in which they attached as Exhibits documents recorded in Elko County which relate to the chain of title and lease interests on the mining claims. In the Reservation of Rights, the mining claims owners requested that any notice of sale distributed by the Debtors be required to contain a description of Royalty interest sufficient to place potential purchasers on notice of the existence and nature of the Royalty interests. An order on the DIP Financing Order was entered included language reserving the rights of these mining claim owners concerning the nature and extent of their claims. The mining claims owners are requesting the Court to provide the same protections and reservations of rights in any order entered approving the sale of the Debtors' assets.

The mining claims owners filed an Objection to the proposed Cure Amount (Doc. 362) in which they re-iterated their reservation of rights.

After a review of the docket on file with the Court and all public documents available at the time of filing this pleading, the mining claims owners are unclear as to the treatment of their claims. Based upon the foregoing, they incorporate by reference the Reservation of Rights (Doc 325) and the Objection to Proposed Cure Amount (Doc 362), and request the Court for an insertion of language in the sale order for a reservation of rights and for such additional relief as the Court deems appropriate under the circumstances.

DATED this 29<sup>th</sup> day of April, 2013.

Demetras & O'Neill  
/s/ J. Craig Demetras  
By: J. Craig Demetras  
Attorney for Finley River LLC, Hillcrest  
Mining Company, LLC and Hi-Tech  
Exploration, LTD